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Attorneys for Nominal Counterclaim Defendant  
ISIS INNOVATION LIMITED

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

NATERA, INC.	)	Case No. 3:12-cv-00132-SI
	)	
Plaintiff,	)	
	)	
vs.	)	<b>ISIS INNOVATION LIMITED'S</b>
	)	<b>ANSWER TO THE</b>
SEQUENOM, INC. and ISIS INNOVATION	)	<b>FIRST AMENDED COMPLAINT</b>
LIMITED	)	
	)	
Defendants.	)	
	)	

Isis Innovation Limited ("Isis"), through its undersigned counsel, hereby answers the First Amended Complaint ("Complaint") of plaintiff Natera, Inc. ("Natera"), as follows:

1. Isis admits that Natera purports to request a judicial determination and declaration of the respective rights and duties of the parties on the disputes recited in the Complaint, but denies that Natera is entitled to such relief. Isis denies the remaining allegations of paragraph 1 of the Complaint.

2. Isis is without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the allegations of paragraph 2 of the Complaint.

2 3. Isis admits the allegations of paragraph 3 of the Complaint.

3 4. Isis admits the allegations of paragraph 4 of the Complaint.

4 5. The allegations of paragraph 5 of the Complaint state legal conclusions as to  
5 which no answer is required.

6 6. The allegations of paragraph 6 of the Complaint state legal conclusions as to  
7 which no answer is required.

8 7. Isis is without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the allegations of paragraph 7 of the Complaint, except that Isis admits that  
10 this Court has personal jurisdiction over Isis because Isis hereby consents to the jurisdiction of  
11 this Court for the purposes of adjudicating the claims and defenses that may be properly  
12 asserted in this action by the parties to this action, and Isis denies that it is otherwise subject to  
13 personal jurisdiction in California.

14 8. The allegations of paragraph 8 of the Complaint state legal conclusions as to  
15 which no answer is required.

16 9. Isis is without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the allegations of paragraph 9 of the Complaint.

18 10. Isis is without knowledge or information sufficient to form a belief as to the  
19 truth or falsity of the allegations of paragraph 10 of the Complaint.

20 11. Isis is without knowledge or information sufficient to form a belief as to the  
21 truth or falsity of the allegations of paragraph 11 of the Complaint.

22 12. Isis is without knowledge or information sufficient to form a belief as to the  
23 truth or falsity of the allegations of paragraph 12 of the Complaint.

24 13. Isis is without knowledge or information sufficient to form a belief as to the  
25 truth or falsity of the allegations of paragraph 13 of the Complaint.

26 14. Isis admits the allegations of paragraph 14 of the Complaint.

1           15. Isis is without knowledge or information sufficient to form a belief as to the  
2 truth or falsity of the allegations of paragraph 15 of the Complaint.

3           16. Isis admits the allegations of paragraph 16 of the Complaint.

4           17. Isis is without knowledge or information sufficient to form a belief as to the  
5 truth or falsity of the allegations of paragraph 17 of the Complaint.

6           18. Isis is without knowledge or information sufficient to form a belief as to the  
7 truth or falsity of the allegations of paragraph 18 of the Complaint.

8           19. Isis is without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the allegations of paragraph 19 of the Complaint.

10          20. Isis is without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the allegations of paragraph 20 of the Complaint.

12          21. Isis is without knowledge or information sufficient to form a belief as to the  
13 truth or falsity of the allegations of paragraph 21 of the Complaint.

14          22. Isis is without knowledge or information sufficient to form a belief as to the  
15 truth or falsity of the allegations of paragraph 22 of the Complaint.

16          23. Isis is without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the allegations of paragraph 23 of the Complaint.

18          24. Isis is without knowledge or information sufficient to form a belief as to the  
19 truth or falsity of the allegations of paragraph 24 of the Complaint.

20          25. In response to paragraph 25 of the Complaint, Isis repeats and realleges the  
21 foregoing paragraphs as if fully set forth herein.

22          26. The allegations of paragraph 26 of the Complaint state legal conclusions as to  
23 which no answer is required.

24          27. Isis denies the allegations of paragraph 27 of the Complaint.

25          28. In response to paragraph 28 of the Complaint, Isis repeats and realleges the  
26 foregoing paragraphs as if fully set forth herein.

1           29. The allegations of paragraph 29 of the Complaint state legal conclusions as to  
2 which no answer is required.

3           30. Isis denies the allegations of paragraph 30 of the Complaint.

4                                   DEMAND FOR RELIEF

5           WHEREFORE, Isis demands that:

6           A.     United States Patent Number 6,258,540 be adjudged and decreed valid and  
7 enforceable;

8           B.     This case be adjudged and decreed exceptional under 35 U.S.C. § 285 entitling  
9 Isis to an award of its reasonable attorneys' fees, and that such reasonable attorneys' fees be  
10 awarded;

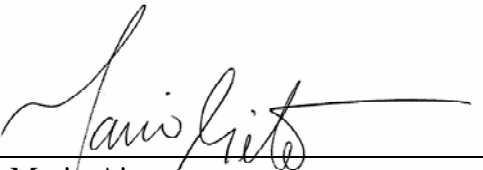
11          C.     Isis be awarded its costs and expenses;

12          D.     For such other and further relief as the Court deems just and proper.

13                                   Respectfully submitted,

14 Dated: April 18, 2012

SATTERLEE STEPHENS BURKE & BURKE LLP

15  
16 By: 

17           Mario Aieta  
18           (*pro hac vice*)

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